

**IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF NEW MEXICO**

**STATE OF NEW MEXICO, *ex rel.*  
State Engineer**

**Plaintiff,**

**v.**

**RAMON ARAGON, *et al.*,**

**Defendants.**

  
**69cv7941 JC**

**RIO CHAMA STREAM SYSTEM**

**THE STATE OF NEW MEXICO'S  
UNOPPOSED MOTION FOR ADDITIONAL EXTENSION OF TIME  
TO FILE HYDROGRAPHIC SURVEYS AND MAPS**

COMES NOW Plaintiff State of New Mexico *ex rel.* State Engineer ("State") and respectfully requests that the Court grant a two week extension of time for the filing of the State's hydrographic survey and maps in the Rio Cebolla and Rio Canjillon subsections of section 3 of the Rio Chama Stream System. In support of this motion the State asserts:

1. Under the Court's orders of July 25, 1995, the State was required to complete and file its hydrographic survey of sections 3 of the Rio Chama Stream System no later than June 30, 2000.
2. The State completed and filed its hydrographic survey report for the Rio Nutrias subsection of section 3 on May 30, 2000.
3. The time for filing the State's hydrographic survey report for the Rio Cebolla subsection of section 3 has been extended to July 28, 2000, by order dated June 16, 2000.
4. The State had anticipated that it will be able to complete and file its hydrographic survey report for the Canjilon Creek subsection of section 3 by June 30, 2000, as required. The

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hydrographic survey division of the Office of State Engineer now finds that it will be unable to meet the June 30th deadline, and has requested an additional two weeks for further proof reading of the report. The delay is necessitated both by the length of the report (about 300 pages) and the fact that there are small data-base inconsistencies in the report that have not yet been resolved.

5. A two week delay in the completion of the report for the Canjilon Creek subsection will cause a similar delay in the completion of the report for the Rio Cebolla.

6. Counsel for the State has contacted the following individuals concerning this motion, and these persons do not oppose the granting of the State's request for an extension of time: Bradley Bridgewater, John Utton and Mary Humphrey. Due to the number of counsel involved and the short time available for the filing of this motion, additional counsel have not been contacted to ascertain whether they would oppose the granting of this motion.

WHEREFORE Plaintiff State of New Mexico *ex rel.* State Engineer respectfully requests that the Court issue its Order extending the time for the completion and filing of the State's hydrographic survey for Canjillon Creek, section 3 of the Rio Chama Stream System, until July 14, 2000, and extend the time for the completion and filing of the State's hydrographic survey for the Rio Cebolla, section 3 of the Rio Chama Stream until August 11, 2000.

Dated June 29, 2000.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I certify that copies of The State of New Mexico's Unopposed Motion for Extension of Time to File Hydrographic Surveys and Maps was mailed to the following persons on June 29, 2000.

  
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